



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

September 30, 2005

Christine Psyk
US Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101
Re: Final 2002 Integrated Report- Submitted for EPA Approval

Dear Ms. Psyk,

Thank you for your comments on the 2002 Integrated Report (IR). The Idaho Department of Environmental Quality (DEQ) received comments on the Draft IR from Paula VanHaagen on August 13, 2003 during our 60 day public comment period. DEQ responded to those comments along with the other 25 comment providers and presented the Final IR on July 23, 2004. DEQ received input from Lisa Jacobsen on October 15, 2004 and Leigh Woodruff on February 13, 2005 regarding errors in the Final IR.

DEQ is very pleased with EPA's input and the quick turnaround on the report: Lisa Jacobsen worked well with DEQ's surface water quality staff throughout our approval process. Overall, the approval process for the 2002 Integrated Report seems improved from the 1998 process.

DEQ has considered EPA's input and has made well over one hundred changes to the Final 2002 IR. These changes are outlined in Attachments 1 and 2:

-Seventy-eight of the proposed changes are corrections to the 1998 EPA Temperature additions; these had been left out of Section 5. All have been placed into Section 5 with Temperature Impairment listed as the pollutant of concern.

- Eleven are changes to Section 4a waters. Numerous comments were offered that stemmed from a TMDL not reported as complete. Two scenarios were common: Either the reviewer expected to find the waterbody on the 4a stream list, but it was present on the 4a Lake/Reservoir list; or the reviewer was looking for a waterbody by its USGS stream name, and it was present on the list by its Waterbody ID (WBID) name. Both scenarios have a common root in the structure of the National Hydrography Dataset (NHD). Until all the NHD segments are correctly labeled by waterbody type (e.g. stream vs. lake) users have to look on both 4a lists. For reporting purposes DEQ chose to segregate the water bodies by waterbody type to correctly account for mileage and

Christine Psyk
September 30, 2005
Page 2

acre totals. Using the interactive web tool avoids this confusion. The second issue of a waterbody being displayed with its waterbody ID name is corrected by the user looking for the Assessment Unit (AU) ID. Likewise, this issue is clarified if the user consults the interactive web tool which lists all the AUs by USGS stream name. This was not possible for the printed product, which creates redundant entries and blank entries because not all the listed waters have a USGS stream name, but all waters have a Waterbody ID name. To add perspective Idaho has over 70,000 named streams combined into 5,200 AUs. EPA reviewers can directly consult the Assessment Database (ADB) for accurate listing information. The ADB correctly accounts for all the waters.

-The remaining changes are from narrative comments made to DEQ by your staff.

All the responses in the attachments refer to the final 2002 IR Submitted to EPA July 23, 2004. That report has the print date of Friday May 14, 2004 in the lower left hand corner of each page. The final 2002 Integrated Report that reflects the changes outlined below has a print date of September 30, 2005 in the lower left hand corner of each page. DEQ requests EPA's approval of the final 2002 IR inclusive the changes outlined in attachments 1 and 2.

If DEQ can assist in answering any questions regarding the proposed changes, please contact Mike Edmondson at 208-373-0257 or michael.edmondson@deq.idaho.gov.

Sincerely,

/s/
Barry N. Burnell
Water Quality Programs Administrator
1410 N Hilton
Boise, Idaho 83706

BNB:ME:te

c: Jim Werntz, USEPA Region 10- Idaho Operations Office
Toni Hardesty, Director, Idaho DEQ

Enclosure

Attachment 1: Summary of actions:

The following 78 AUs will be moved from Section 2 or Section 3 into Section 5 and listed for Temperature:

ID17010213PN009_02	Temperature
ID17010303PN034_02	Temperature
ID17010303PN034_03	Temperature
ID17040202SK033_02	Temperature
ID17040202SK034_03	Temperature
ID17040202SK036_03	Temperature
ID17040205SK005_04	Temperature
ID17040205SK008_04	Temperature
ID17040205SK016_04	Temperature
ID17040211SK013_02	Temperature
ID17040217SK008_03	Temperature
ID17040217SK009_02	Temperature
ID17040217SK015_02	Temperature
ID17040217SK020_03	Temperature
ID17040217SK021_02	Temperature
ID17040217SK021_03	Temperature
ID17040217SK025_02	Temperature
ID17040221SK014_03	Temperature
ID17050103SW007_02	Temperature
ID17050112SW009_03	Temperature
ID17050123SW017_03	Temperature
ID17050201SW015_02	Temperature
ID17060201SL021_04	Temperature
ID17060201SL023_04	Temperature
ID17060201SL024_04	Temperature
ID17060204SL043_03	Temperature
ID17060204SL052a_02	Temperature
ID17060204SL052b_02	Temperature
ID17060204SL062b_02	Temperature
ID17060204SL064b_02	Temperature
ID17060303CL001_02	Temperature
ID17060303CL059_03	Temperature
ID17060303CL061_02	Temperature
ID17060303CL062_02	Temperature
ID17060303CL062_03	Temperature
ID17060303CL063_02	Temperature
ID17060303CL063_03	Temperature

ID17060303CL064_02	Temperature
ID17010104PN025_02	Temperature
ID17010215PN019_02	Temperature
ID17010304PN016_02	Temperature
ID17040202SK002_05	Temperature
ID17040202SK005_02	Temperature
ID17040202SK005_04	Temperature
ID17040202SK034_02	Temperature
ID17040202SK035_02	Temperature
ID17040202SK035_03	Temperature
ID17040205SK017_04	Temperature
ID17040212SK040_02	Temperature
ID17040217SK001_05	Temperature
ID17040217SK003_02	Temperature
ID17040217SK003_03	Temperature
ID17040217SK003_04	Temperature
ID17040217SK019_03	Temperature
ID17050102SW035_04	Temperature
ID17050112SW009_06	Temperature
ID17050113SW032_02	Temperature
ID17050124SW008_02	Temperature
ID17060103SL001_08	Temperature
ID17060103SL004_08	Temperature
ID17060201SL024_02	Temperature
ID17060201SL024_03	Temperature
ID17060204SL041_04	Temperature
ID17060204SL042_03	Temperature
ID17060204SL066a_03	Temperature
ID17060209SL057_02	Temperature
ID17060210SL007_04	Temperature
ID17060303CL010_02	Temperature
ID17060303CL010_04	Temperature
ID17060303CL032_02	Temperature
ID17060303CL032_03	Temperature
ID17060303CL052_03	Temperature
ID17060303CL052_04	Temperature
ID17060303CL057_03	Temperature
ID17060306CL056_04	Temperature
ID17060306CL056_05	Temperature
ID17040202SK005_03	Temperature
ID17060204SL064a 02	Temperature

The follow corrections have be made to the Integrated Report. All the AUs listed below

will be moved to Section 5 for the impairment(s) listed in the right hand column.

ID17050122SW012_03	Biological Impairment
ID17060305CL - Lucas Lake	See below in narrative comments
ID17050124SW007_05	Nutrients, Sediment
ID17040207SK026_02	Temperature
ID17040207SK026_03	Temperature

AU	STREAM NAME	LISTING ACTION NEEDED (per Leigh Woodruff review) Response in italics
17010214PN018_02a	Falls Creek	<i>nut - 4A: This AU has a TMDL** as of 10/8/2002, but no beneficial use was identified as impaired so the AU did not display properly</i>
17010214PN022_02	West Gold Crk	<i>sed - 4A: Present on 4a TMDL Date = 4/2/2001</i>
17010214PN024_02	Chloride Crk	<i>sed - 4A: Present on 4a TMDL Date = 4/2/2001</i>
17010215PN003_04	East River Mainstem	<i>sed, temp - 4A: Present on 4a TMDL Date = 6/23/2003</i>
17010215PN030_04	Lower Wst Branch Priest Rvr	<i>sed - 4A: Present on 4a TMDL Date = 6/23/2002</i>
17010301PN004_03	Prichard Creek	<i>sed - 4A: Present on 4a TMDL Date = 2/2/2002</i>
17010301PN004_04	Prichard Creek	<i>sed - 4A: Present on 4a TMDL Date = 2/22/2002</i>
17010301PN005_02	Prichard Creek	<i>sed - 4A: Present on 4a TMDL Date = 2/22/2002</i>
17010301PN005_03	Prichard Creek	<i>sed - 4A: Present on 4a TMDL Date = 2/22/2002</i>
17010301PN007_02	East Fork Eagle	<i>sed, metals - 4A: Present on 4a TMDL Date = 2/22/2002</i>

17010301PN020_02	Teepee Crk	sed - 4A: <i>Present on 4a TMDL Date = 2/22/2002</i>
17010301PN020_03	Teepee Crk	sed - 4A: <i>Present on 4a TMDL Date = 2/22/2002</i>
17010301PN029_02, 03	Cougar Gulch	sed - 4A: <i>Present on 4a TMDL Date = 2/22/2002</i>
17010303PN015_02	Baldy Creek	sed 4A: <i>Present on 4a TMDL Date = 7/14/2000</i>
17010303PN015_02	Larch Creek	sed 4A: <i>Present on 4a TMDL Date = 2/22/2002</i>
17040204SK041_02	Fox Creek	sed - 4A: <i>Added sediment TMDL</i>
17040204SK042_02	Fox Creek	sed - 4A: <i>Added sediment TMDL</i>
17040207SK018_02a	Lanes Creek	sed - 4A: <i>This AU has a TMDL but no beneficial use was identified as impaired so the AU did not display properly</i>
17040209SK001_07	Milner Reservoir	nut - 4A: <i>This AU has a TMDL as of 6/28/2002, but no beneficial use was identified as impaired so the AU did not display properly</i>
17040209SK002_07	Milner Reservoir	nut - 4A: <i>This AU has a TMDL as of 6/28/2002, but no beneficial use was identified as impaired so the AU did not display properly</i>
17040212SK000_02	Blind Canyon	sed, phos, bact - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040212SK001_07	Bliss Reservoir	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040212SK005_02	Riley Creek	sed, phos, bact - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040212SK005_07	Lower Salmon Falls Reservoir	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002 (See Snake River)</i>
17040212SK005_07	Upper Salmon Falls Reservoir	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>

17040212SK007_02	Crystal Springs	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i> bact – 5
17040212SK007_07	Ellison Creek	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040212SK019_07	Alpheus Creek	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040212SK019_07	Shoshone Falls Reservoir	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040212SK028_02	Clear Springs	sed, phos - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040219SK001_06	Malad River	bact, nut, sed - 4A (this segment is covered in the Big Wood River TMDL): <i>Present on 4a TMDL Date = 5/15/2002</i>
17040219SK011_02	East Fork Wood River	nut - 4A: <i>Present on 4a TMDL Date = 5/15/2002</i>
17040219SK011_03	East Fork Wood River	nut - 4A: <i>This AU has a TMDL as of 5/15/2002, no beneficial use was identified as impaired so the AU did not display properly</i>
17050104SW013_03	Blue Creek Reservoir	sed - 4A: <i>Present on 4a TMDL Date = 3/15/2003</i>
17050104SW026_04	Deep Creek	sed, temp - 4A: <i>Present on 4a TMDL Date = 3/15/2003</i>
17050104SW026_05	Deep Creek	sed, temp - 4A: <i>Present on 4a TMDL Date = 3/15/2003</i>
17050104SW032_03	Castle Creek	sed, temp - 4A: <i>Present on 4a TMDL Date = 3/15/2003</i>
17050107SW008_02	Big Spring	temp - 4A: <i>Present on 4a TMDL Date = 2/15/2000</i>
17050107SW011_02	Corral Creek	temp - 4A: <i>Present on 4a TMDL</i>

		<i>Date = 2/15/2000</i>
17050123SW007L_0L	Lake Fork	nut (or phos) - 4A: <i>Present on 4a TMDL Date = 5/15/1996-Present</i>
17050123SW008_05	Gold Fork River	nut (or phos) - 4A: <i>Present on 4a TMDL Date = 5/15/1996-Present. Added sediment TMDL.</i>
17050123SW012_03	Lake Fork	nut (or phos) - 4A: <i>Present on 4a TMDL Date = 5/15/1996-Present</i>
17060108CL005_02a	Idlers Rest Creek	nut, sed, bact, ammonia, temp - 4A (included in implementation plan, but not specifically identified in TMDL - probably not in NTTs): : <i>Present on 4a TMDL Date = 2/15/1998</i>
17060108CL005_02b	Idlers Rest Creek	nut, sed, bact, ammonia, temp - 4A (included in implementation plan, but not specifically identified in TMDL - probably not in NTTs): : <i>Present on 4a TMDL Date = 2/15/1998</i>
17060203SL047_02	Wilimans Lake	nut - 4A: <i>Present on 4a TMDL Date = 7/15/2001</i>
17060204SL065b_02	Geertson Creek	sed - 4A: <i>Added sediment TMDL</i>
17060204SL066b_02	Kirtley Creek	sed - 4A: <i>Present on 4a TMDL Date = 3/15/2000</i>
17060305CL006_02	Stockney Creek	DO, bact, temp, sed, nut - 4A: <i>Present on 4a TMDL Date = 7/15/2004</i>
17060305CL006_03	Stockney Creek	DO, bact, temp, sed, nut - 4A: <i>Present on 4a TMDL Date = 7/15/2004. Added TMDLs for DO, Bacteria, and Nutrients</i>
17060306CL009_03	Lapwai Creek	nut, sed, DO, temp, bact - 4A: <i>Present on 4a TMDL Date = 3/15/1999: NOTE: Lapwai Creek and Winchester Lake are part of the same AU and show up in the Section 4a lakes list</i>
17060306CL009_03	Winchester Lake	nut, sed, DO, temp - 4A: <i>Present on 4a TMDL Date = 3/15/1999. NOTE: Lapwai Creek and Winchester Lake are part of the same AU and show up in the Section 4a lakes list</i>

17060306CL010_02	Lapwai Creek	nut, sed, DO, temp, bact - 4A: <i>Present on 4a TMDL Date = 3/15/1999: Added TMDLs for Nutrients, DO, and Temperature.</i>
17060306CL010_03	Lapwai Creek	nut, sed, DO, temp, bact - 4A: <i>Present on 4a TMDL Date = 3/15/1999. Added TMDL for DO.</i>
17060306CL035_02	Heywood, Wilson Cr, and tribs	bact, nut, DO, sed, temp - 4A (but probably not in NTTs as allocation table is more explicit than approval letter) : <i>Present on 4a TMDL Date = 3/15/1999</i>
17060306CL037_03	Winter Creek	bact, nut, DO, sed, temp - 4A (but probably not in NTTs as allocation table is more explicit than approval letter):
17060306CL038_02	Winter Creek	bact, nut, DO, sed, temp - 4A (but probably not in NTTs as allocation table is more explicit than approval letter)
17060308CL034_02	Three Bear Creek	bact, sed, temp - 4A: <i>Present on 4a TMDL Date = 3/15/1999.</i>
17060308CL034_03	Three Bear Creek	bact, sed, temp - 4A: <i>Present on 4a TMDL Date = 3/15/1999.</i>

**** TMDL date is accurate for the year and month only. The day, where available was provided, otherwise the 15th day of the month is reported only as a place holder.**

17040207SK011_02 should be removed from Section 2 and Placed back into Section 3. This AU has been moved as recommended.

ID17040207SK015_04 should have sediment removed as a pollutant from Section 5 per Leigh Woodrugh. Records indicate this AU was listed in 1998 for siltation and for Organic pollutants (EPA pollutant code 2010)

AU	STREAM NAME	LISTING ACTION NEEDED (per Leigh Woodruff review) Response in italics
17010214PN022_02	West Gold Crk	temp – 5: <i>Added Temperature</i>
17010214PN024_02	Chloride Crk	temp - 5: <i>Added Temperature</i>
17010215PN030_04	Lower Wst Branch Priest	temp - 5: <i>Added Temperature</i>

	Rvr	
17010301PN004_03	Prichard Creek	metals, temp - 5: <i>Added Temperature and metals</i>
17010301PN004_04	Prichard Creek	metals, temp -5: <i>Added Temperature</i>
17010301PN005_02	Prichard Creek	metals, temp - 5 <i>Added Temperature and metals</i>
17010301PN005_03	Prichard Creek	metals, temp - 5 <i>Added Temperature and metals</i>
17010301PN007_03	Eagle Creek	sed, metals – 5: <i>added metals</i>
17010302PN001_02	Milo Creek	metals – 5: <i>Metals TMDL completed and Approved. Added sediment as a pollutant. Sediment TMDL completed, not known if approved.</i>
17010303PN015_02	Baldy Creek	temp – 5: <i>Part of Latour Cr AU. Note AU ID is same as below.</i>
17010303PN015_02	Larch Creek	temp - 5: <i>Part of Latour Cr AU. Note AU ID is same as above.</i>
17010305PN003_04	Spokane River	metals – 5: <i>Added Metals</i>
17010305PN003_04	Spokane River	nut – 5: <i>Phosphorus was listed as the pollutant of concern.</i>
17040219SK	Cove Creek	sed, nut, bact – 5: <i>Sediment and Nutrients were listed: Added Bacteria</i>
17020104SW029_03	Camas Creek	temp – 5: <i>The AU referenced does not exist.</i>
17040204SK025_02	Mahogany Creek	sed – 5: <i>Has a sediment TMDL. See 4a and 4a comments.</i>
17040207SK015_04	Mill Canyon	sed – 5: <i>See Wham Creek below</i>
17040207SK015_04	Wham Creek	sed - remove from 5: <i>No action taken: Mill and Wham Creeks are in the same AU. The comment above says add sediment. Sediment was listed as a pollutant.</i>

17040212SK007_02	Crystal Springs	bact – 5: <i>Listed, See Snake River</i>
17040212SK028_02	Clear Springs	bact – 5: <i>Added Bacteria</i>
17040219SK024_02	Placer Creek	nut – 5: <i>Listed for Phosphorus</i>
17040219SK024_03	Placer Creek	nut – 5: <i>Listed for Phosphorus</i>
17040219SK024_03	Warm Springs Creek	nut, sed, bact – 5: <i>Nutrients were listed, added sediment and bacteria</i>
17060204SL023_02	E Frk Hayden Creek	sed – 5: <i>Has sediment TMDL. Changed beneficial use to NFS so it will display properly.</i>
17060306CL008_04	Lapwai Creek	temp, sed, nut, DO, bact – 5.
17060308CL030_03	Elk Crk N. of Elk Crk Res	temp – 5: <i>Has Temperature TMDL.</i>

Attachment 2: EPA Comments and DEQ Responses

1. Some creeks listed for sediments in 1998 are not listed for sediments in 2002. Why? The waters are now on the list for temperature.

17010213

Wellington Creek (falls to Lightning creek) was listed for sediment in 98 and temperature in 02 (no sediment) **Monitoring data indicate the beneficial uses are fully supporting their uses and in effect the segment was delisted for sediment. Temperature was later added as the impairment.**

Granite Creek: listed in 98 for sediment, listed in 02 for temperature (no sediment) **Same as Wellington Creek.**

2. Lower Boise

AU/parameters are missing from the IR, dropped from the category 5 but found no where else.

17050114SW003_02 - 1st and 2nd order nutrient and sediment: **Bacteria: see page 50**

17050114SW003_03 - 3rd order nutrient and sediments: **Temperature see page 50**

17050114SW003_04 - 4th order nutrients: **Temperature, Sediment, and DO see page 50.**

these are missing from the entire report - they cannot be de-listed as of 11/04.

Nutrients and sediment were re-listed as needed based upon EPA disapproval of the Lower Boise UAA's.

3. ID17050114SW010_02 - Fivemile Creek 1st and 2nd Order :**These remain in Section 5.**

ID17050114SW010_02

ID17050114SW010_03. Listed in '98 for DO, Nut Sed: **Remains listed on page 50 for the same pollutants**

ID17050114SW010_02. Listed in '02 for Path. **Remains listed for Pathogens see page 50**

DO is in ID17050114SW010_03 in cat 5

Nut is in ID17050114SW 010_03 in cat 5

Sed is in ID17050114SW010_03 in cat 5

there is nothing from this HUC in category 2 even though the RTC says that 010_02 is in category 2. **Correct: This is an error in the Response to Comments Document; No change needed to any Sections of the Integrated Report.**

4. 17010301PN004_03, 17010301PN004_04, 17010301PN005_03 - Pritchard Creek - (3500)

delist for bac, do, nut, o/g, but in 98 it was listed for bac, do, halt, nut o/g sed and temp.

Now it is listed for metals and temp. **See the documentation in ADB associated with the ID17010301PN004 AU. The changes are clearly documented. See referenced TMDL for additional detail.**

(note: A TMDL was done for sediment, however, it was never listed for pH. Halt can be de-listed just by reason of it being "pollution" and not a "pollutant.") Where are the

water bodies/parameters for bacteria, DO, nutrients, oil and grease? None of these have been addressed in the status reports that were done for each AU, and not in any of the other categories (not in 4a, 4c, 1, 2, or 3). **Correct: 004_03 and 004_04 AUs appear in Section 4c on page 11.**

17010301PN008_02 - West Fork Eagle Creek - (Old number 5617)

'98 listed for halt, mtu, pH, sed. IDEQ wants to delist for pH. '02 listed for temp (no pH) and a sediment and metals TMDL has been done.

The de-listing for pH has not been addressed in the status report that was done for AU, and not in any of the other categories (not in 4a, 4c, 1, 2, or 3).

ID17010301PN008_02 appears in Section 5 on page 29. ADB documentation:

"1999 DEQ temp data show criteria violation. Pollutants Habitat Alteration and pH should be dropped as causes for impairment. Justification can be found in the North Fork Coeur d'Alene TMDL. Sediment TMDL completed 2002." Additionally two documents are referenced supporting the temperature listing.

—NEW---

EPA's addition to the 1998 Idaho 303(d) - impaired due to temperature (mostly)

It appears that many of the water bodies EPA added to the 303(d) list have not been incorporated into the 2002 IR (category 5/303(d) list). In the status reports of the IR for these water bodies it is not defined in the section "Pollutant" and in the section "Assessment Comments" there are, at times, incorrect statements. Such as: "... EPA approved this full support status in 2000" (for the 1998 list) When in fact EPA did not approve this AU because data showed it to be impaired for temperature. Also, an other statement used often "... All attributes carried forward from 1998 list" this is also false statement because it was identified for the 1998 list, by EPA, that these AUs are impaired for temperature. See Excel spreadsheet for water bodies that belong on the 303(d) list. **See e-mail of January 26, 2005. The e-mail and attachments detail the status and listing disposition of each of the 1998 EPA temperature additions.**

First, the document clarifies which AUs were covered by those additions and then points out which were in error. The 134 temperature additions made by EPA in 2001 to the 1998 list affect 273 Assessment Units. In summary:

167 (61.4%) were maintained as Impaired for temperature on the 2002 IR.

78 (28.5%) were incorrectly classified as Full Support or Not Assessed

27 (9.9%) were re-monitored and re-assessed and found to be fully supporting their uses and meeting WQS.

1 (0.01%) is wholly contained in the wilderness

Additional information stating why these assessment units were removed from the 303(d) list would be helpful.

16010201BR016_03a - Little Saint Charles Creek

No information in the status sheet. Must provide just cause (no info and not in ADB but in website)

When Assessment Unit split was made, assessment information may not have

been updated. This AU was assessed with the 1996SPOCA053 monitoring location. The group of St Charles Creek AUs in WBID 016 3rd order are all supporting their beneficial use support status.

17060302CL006_02a - Island Creek - source to mouth: **ADB provides the following comment: Assessment is based on BURP survey data collected 8/96. WBAG II assessment corroborates the Lower Selway Subbasin Assessment, completed 12/00 by Nicholas Bugosh, DEQ.**

17060302CL003_04 - O'Hara Creek - confluence of Hamby Fork and mouth

17060302CL006_02b - Slide Creek - source to mouth

What are the WBAGII results. They should be on the status sheet

17060303CL020_05 - Lochsa River - confluence of Crooked Fork, White Sand Center

17060303CL009_05 - Lochsa River - Indian Grave Creek to fish Creek

17060303CL013_05 - Lochsa River - Warm Springs Creek to Indian Graves Creek

17060303CL001_05 - Lochsa River - Deadman Creek to mouth

17060303CL003_03 - Lochsa River - Old Man creek to Deadman Creek

17060303CL003_05 - Lochsa River - Old Man Creek to Deadman Creek

17060303CL008_05 - Lochsa River - Fish Creek to Old Man Creek

-see response below the Lochsa River SBA comment

17060303CL009-02 - Holly Creek - and tributaries

This segment is not covered in the HDR Report. This AU has new monitoring data Holly Creek (1998SLEWA007) and Sherman Creek (1998SLEWA008) that were assessed with WBAG 2 and found to be fully supporting their uses. In fact the scores fell in the upper 50th percentile of reference sites.

Lochsa River SBA and Temperature Modeling contract Report (2002)

Water bodies assessed for temperature that are addressed in this report need to provide the just cause for why they were de-listed for temperature. The status sheet must speak directly to why the water bodies were de-listed (provide page where it is stated in the report)

17060303CL020_05 - Lochsa river, confluence of Crooked fork, White Sand Creek

All AUs that were de listed based on the Lochsa SBA or the HDR Modeling data have been added back to Section 5 of the Integrated Report pending further discussion with EPA Region X.

17010303PN032_03 - Feman Creek, Feman Lake to mouth

17010303PN033_03 - Feman Lake

For Fernan Creek, Fernan Lake to mouth (17010303PN032_03), and Fernan Lake (17010303PN033_03, which should have a 0L in it) the reference is Table 16, page 31, and Section 2.3.2.5. Fernan Lake and Creek, pages 17-19 of TMDL:

2.3.2.5. Fernan Lake and Creek

A lake water quality assessment was completed on Fernan Lake during the 1991 field season (Mosier 1992). Nutrient data indicate the lake was mesotrophic (Table 8) and was not exceeding the nuisance weed growth criterion. Additional parameters collected in 1991 support the mesotrophic condition of Fernan Lake. Algal blooms have commonly been observed on the lake suggesting it is at or close to a eutrophic classification. The lake is currently in a state that intervention in the watershed could reduce phosphorous export to the lake and slow the pace of eutrophication. The possibility that the lake would become anoxic in its bottom waters is remote. The lake is relatively shallow (7 meters) allowing for wind driven re-oxygenation even at depth. Dissolved oxygen measurements completed at the time of the assessment showed bottom water to be low in oxygen during the summer (0.8 mg/L), but not anoxic. Water quality measurements collected to date from Fernan Lake do not violate water quality standards. However, the lake is close to violations and algal blooms occur on a yearly basis. An advisory TMDL should be developed for the lake based on further measurements of phosphorous loading.

Table 8: Fernan Lake Water Quality Average Nutrient Data

Location	Total Inorganic N (ug/L)	Total Phosphorous (ug/L)
Mid-lake	50	21

Fernan Creek is listed for bacteria, dissolved oxygen, habitat alteration, nutrients and sediment. The stream currently has stable banks with stable vegetation. Sediment sources to the immediate stream are few and not severe. Upstream sources are precluded by Fernan Lake. No apparent source of bacteria exists. The habitat may have been altered in the past but stable habitats have reestablished along the stream. The stream is well shaded and shallow suggesting oxygen level would not be a problem. The pollutant listing on the 1998 303(d) lists may well date back to 1988 when the golf course and highway were under construction. A decade has passed since the construction period. Vegetation has reestablished reducing sedimentation and producing habitats. The creek likely has a residual nutrient problem associated with its primary source of water, Fernan Lake, and possibly exacerbated by fertilization of the adjacent golf course.

Water samples from Fernan Creek were collected for fecal coliform and E coli analysis during the low discharge period of summer 1999. Analysis indicated four fecal coliform and ten E coli per 100 mL (BURP, 1999). These values are sufficiently well below the fecal coliform primary contact standards of 500 fecal coliform per 100 mL and the proposed recreational standard of 406 E. Coli per 100 mL that no additional testing was deemed necessary.

The stream likely does receive water enriched in nutrient from the lake. The golf course which flanks the west edge of the quarter-mile segment may also be a source of nutrients dependent on the turf management. The lower eighth-mile of stream fronts the golf course on one side. It is unlikely that a short segment would receive an important nutrient load or it would have an affect before discharge to the lake.

Nutrients supportive of aquatic plant growth were assessed on water samples from lower Fernan Creek. Samples were collected above the golf course. Total phosphorous concentration was 28 ug/L as phosphorous. The guideline used by DEQ for interpretation of the excess nutrients narrative standard is 100 ug/L total phosphorous in flowing streams (USEPA, 1972). The total phosphorous concentration measured for the creek is well below the guideline. Total Kjeldahl nitrogen was 230 ug/L as nitrogen, while nitrate-nitrite analysis was 290 ug/L as nitrogen. The nitrogen data indicate that most of the nitrogen is in the form of nitrate-nitrite. The guideline for excess nitrate is 300 ug/L as nitrogen (Sawyer, 1947; Müller, 1953). The concentration measured in lower Fernan Creek is quite close to the guideline, but below it. The high nutrient level most probably has its origin in Fernan Lake.

Just cause in this case is newer monitoring data showing no WQS criteria violations.

17010305PN012_02 - Rathdrum Creek, Twin Lakes to mouth
From *Subbasin Assessment and Total Maximum Daily Loads of Lakes and Streams Located or Draining to the Rathdrum Prairie* (October 2000) the document reference is:

Table 10, page 22

Newer sediment modeling, nutrient and bacteria monitoring, show that the WQS are not exceeded, and that cold water aquatic life use/secondary contact are fully supported. Nutrient concentrations are below guidelines.

Just cause in this case is newer monitoring and modeling data show no WQS criteria violations.

It references a document for just cause but does not provide it - no other data is provided on the status sheet. The document must be available (by link) and define what page the just cause is available for the reader.

17060201SL081_02 - Salmon River Source to Alturas Lake Creek - Taylor Creek Override - Taylor creek is intermittent. Being intermittent is not enough just cause to

remove a water body from the need for a TMDL. Need more information about Taylor Creek before its score would be overridden.

The assessment and interpretation of more recent or more accurate data demonstrate that the applicable WQS(s) are being met. DEQ Evaluated 3 monitoring sites and the data support the assertion that beneficial uses are supported and WQS are met. The comment about intermittent is irrelevant as it scored a “2” for condition rating and no “over-ride” needed to be invoked.

17060201SL068_05 - Salmon River - Unnamed trib

There is no data in the status report except in Assessment comments where it says it has a condition rating of 2.333. Where did this value come from?

From the ADB “Assessment performed per WBAGII large river assessment process. A minimum of two (2) biological assemblages were assessed to make this support status call. River Condition Rating = 2.33”

Large river data has to be analyzed and interpreted by hand e.g. it is not directly supported by the Idaho modifications to ADB1 and as such the results do not display rather I typed them in by hand and referenced the Assessment Process used.

17060201SL019_04 - Salmon River - Squaw Creek to East Fork Salmon River

There is no data in the status report except in Assessment comments where it says it has a condition rating of 2.666. Where did this value come from?

Large River. See above.

17060201SL031_05 - Salmon River - Yankee Fork Creek to Thompson Creek

There is no data in the status report except in Assessment comments where it says it has a condition rating of 2.5 The document must be available (by link) and define what page the justification is available for the reader.. Where did this value come from?

Large River. See above.

17060207SL061_02a - Big Mallard Creek - headwaters to SF Big Mallard Creek

How was it determined that it is supporting its beneficial uses. What results, values, condition rating or data determined this? Not enough justification to just say all streams were assessed and determined to be fully supporting their aquatic life uses. Need more information.

This unit is upstream from an AU (17060207SL061_03) that was monitored and assessed as full support. Within the context of the SBA this data was

extrapolated to this unit as little anthropogenic occurs within the AU. Further modeling data indicate that sediment loads were below the variability of the model. For further documentation see explanation for ID17060207SL061_03 below.

17060207SL061_03 - Big Mallard Creek - SF Big Mallard Creek to mouth
More discussion is needed to explain why the Mid Salmon TMDL determined AU to be de-listed. Document provided does not explain enough. Condition Rating is not clear. How were all the indices averaged to determine the condition rating? [NOTE: correction to my comment is in guidance page 6-13 explains why the condition rating is equal to 0]

Both BURP sites (1997SLEWC012 & 1997SLEWC015) on ID17060207SL061_03 scored low in Stream Fish Index because they had brook trout present, which are non native. This is not unusual, as upper Big Mallard is blocked by a fish barrier 3.5 miles up from the Salmon River. Noble Creek a tributary to Big Mallard Creek had a SFI of 98.8 (Appendix 8 TMDL) out of 100 possible. Noble Creek enters Big Mallard Creek just below the fish barrier. Were there no barrier to upstream fish passage SFI scores would be similar to those recorded on Noble Creek as habitat is very similar. Habitat scores for both of the above BURP sites were 71 and 72 respectively. The index considers % fines in the wetted width, cobble embeddedness and Wolman size classes, all sediment characteristics of the stream bottom (see section 5 of Idaho Small Stream Ecological Assessment Framework 2002). Road density for Big Mallard is estimated at 0.58 mi/mile² and its estimated that only 4% of the watershed is disturbed by humans (p. 24 of TMDL). Natural sediment yield is estimated to range between 40-60 lbs/ac/y, and Big Mallard's yield is 32 lbs/ac/y (p. 23 TMDL). Paradiso (2000) estimated the range of sediment yield over natural for Big Mallard to be 3.5% and 2% for Little Mallard. These values are well within the range of natural variation (p. 45 and Appendix 2 TMDL). 1997SLEWC012 had 20% fines and 1997SLEWC015 had 19% fines. Relyea (1999) in her Fine Sediment Index suggests a fine sediment threshold at 30%, which both sites fell below. Clark (2000) in Appendix 1 of TMDL, using Relyea (1999), Hafele and Hinton (1996) and Wiseman (1996) sediment tolerance values for macroinvertebrates concluded that Big Mallard Creek did not appear to be impaired for fine sediment.

17060207SL008_07 - Salmon River - Chamberlain Creek to South For Salmon River
Has this AU been determined to be in Wilderness area and for that reason it has been removed from the 303(d) list? The reason for de-listing should be more direct. No information is given about how assessment determination was made. In cases where a model is being used there should be a brief description of the model.

See reply in ID17060207SL001_07

17060207SL001_07 - Salmon River - South Salmon River to river mile 106 (T2 .

Has this AU been determined to be in Wilderness area and for that reason it has been removed from the 303(d) list? The reason for de-listing should be more direct. No information is given about how assessment determination was made. In cases where a model is being used there should be a brief description of how the model works

These segments have been a long standing mistake perpetuated through the 1994, 1996, and 1998 listing cycles. The information used to list this segment was derived from the 1992 305(b) Report. In the wake of the lawsuit these segments were added to the 1994 list by the Court, but no pollutant was ever identified. By the 1998 Listing cycle these segments had been inadvertently tagged with the pollutant “unknown”. This later came to be misunderstood as ambient monitoring data as is intended when the state purposely lists small streams with the pollutant as unknown where BURP data indicate the beneficial use is not supported.

In fact, Appendix D of the 1992 305(b) Report (page 510) identifies NO pollutant. Idaho Fish and Game requested this listing presumably as a protective measure yet they supplied no data and identified no pollutant. As such EPA Guidance relating to “good cause” for delisting states:

“Documentation that the State included on a previous Section 303(d) list an impaired segment that was not required to be listed by EPA regulations, e.g., segments where there is no pollutant associated with the impairment.”

The Middle Salmon River-Chamberlin Creek SubBasin Assessment and TDML outlines these arguments on page 34 and recommends de listing on page 54. Additionally NEZSED modeling for the lower portion of the HUC down to Riggins states that anthropogenic sediment sources above the South Fork Salmon River (far downstream from these AUs) is less than 0.05% of Natural Background (page 45 and Appendix 2).

17060305CL - Lucas Lake. Is no longer on the 303(d)list or on the website. What happened to it?

As it has been discussed many times with Region X, Lucas Lake does not exist in NHD; USGS has not indexed this water. Because it is not in NHD, it is not in our GIS, because it is not a part of our GIS there are no corresponding database records in ADB2 to account for Lucas Lake. There exists e-mail correspondence documenting 2-3 segments that do not exist in NHD. Until such time that USGS indexes these waters, DEQ and EPA will have to maintain them solely in the Settlement Agreement’s TMDL schedule or on a Post-it® note.

17060209SL010_02 - Deer Creek - source to mouth
Not enough info (just cause). Results of BURP data need to be explained since it is extrapolated from downstream segment.

Data and index scores from the 1997SLEWB021 BURP site were extrapolated to the 02 assessment unit based on the proximity of the BURP site and it's location at the pour point of the 2nd order segments of Deer Creek and East Fork Deer Creek. Water quality from the upstream assessment unit is fully supporting, as the 3rd order segment (located below this confluence), is full support. The 3rd order assessment unit is also located within the same land use as the 2nd order assessment unit (forest).

17050120SW005_04 - South Fork Payette River - source to and including Trail Creek Assessment comments states that segment is entirely in a wilderness area and is in section 1. I found the AU in section 2. Are you stating that if the water body is in a wilderness area that it is just cause to be de-listed. Where is this justification described in you guidance?

The AU is not in the wilderness and no data support its being in Section 1. This AU is 0.73 miles in total length and is an artifact of the WBID System. It is adequately represented by the monitoring site on the downstream unit (same stream order, just a different WBID). The downstream unit ID17050102SW001_04 is represented by a large river monitoring site (1998RBOIP003) that was evaluated for macroinvertebrates, diatoms, and habitat. Its condition rating was 3.0. The ID17050102SW005_04 unit is drained entirely by wilderness and the unit boundary is less than 0.2 miles above it. Given the extremely small size of this AU, its downstream proximity to the wilderness and the Full Support status of the downstream unit EPA should concur with DEQ that the Full Support Status call is appropriate and the AU should be retained in Section 2.

17050122SW012_03 - Soldier Creek - 3rd order
Condition rating is 0 and status is Failed. Why was this de-listed? You must provide just cause for de-listing.

The data do not support de-listing this AU. It should be moved to Section 5 and the pollutant should be listed as "unknown" or to be in line with 2004 guidance "biological impairment".

17050124SW007_05 - Weiser River - source to Keithly Creek
No information is given other than "Segment is FS using WBAGII" This is not enough information to show just cause. Where is data, condition rating and status?

This AU should be moved to Section 5 until TMDL approved.

17040207SK022_02 - Sheep Creek - source to mouth
No information is given about why these AUs should be de-listed. Need to provide data

condition rating, status, or something else that would provide just cause.

Newer monitoring data extrapolated from the downstream AU indicate this AU is fully supporting it's BUs. USFS ownership and landowner activity is similar in the two AUs making this a valid extrapolation of data.

17040207SK011_02 - Trail Creek - source to mouth

No information is given about why these AUs should be de-listed. Need to provide data condition rating, status, or something else that would provide just cause.

Due to a lack of documentation this AU should be moved back to Category 3 of the IR.

17040208SK014_02a - upper Cherry Creek

Only 1 index is mentioned for de-listing this water body. IDEQ guidance states on page 6-13 that if there are less than 2 indexes, then the waterbody is not assessed unless other Tier I data is available. More data needs to be provided or else this waterbed is not assessed, therefore, this waterbed should not be de-listed.

This is a misinterpretation of DEQ notations to the assessment. All indexes were used. What is noted was that ADDITIONAL Tier 1 USFS fish data was run through our SFI and the results were noted. Unfortunately it reads as if the USFS data were the only data considered. This remains assessed as Full Support.

17040211SK001_03 - Big Cottonwood - source to mouth

Newer monitoring data (1997) and analysis indicated the BU is fully supported. The monitoring site 1997STWFA060 shows a condition rating of 3.0. 1997STWFA041 was included by mistake. No reference to the SBA is needed.

17040211SK005_03 - Goose Creek - Beaverdam to Lower Goose Creek Reservoir.

Newer monitoring data (1997, 1998, & 1999) and analysis indicated the BU is fully supported. These data show a combined condition rating of 2.33 and includes macroinvertebrate, fish, and habitat data. No reference to the SBA is needed.

17040219SK011_03 - East Fork Wood River - source to Hyndman Creek

This unit is covered in the Big Wood/Upper Snake Rock TMDL approved on 5/15/2002. This AU has EPA approved TMDLs for sediment and nutrients. In addition, newer monitoring data (1998STWFA049: Cove Creek & East Fork Wood River are the same AU) have a condition rating of 2.0 and the beneficial uses are fully supported.

What does the SBA say if it is giving the just cause. There is no link to these SBAs on this status sheet. A link to the IDEQ website for the TMDL program is too broad. If documents are going to be used to provide just cause then it must be defined where the information is. The Assessment comments should provide the document name and page number where the just cause is and the link must go to that document. No one should have to hunt for the information to determine just cause.

Agreed. Future assessments and assessors will do a better job of documenting rational for delisting.

Subbasin 17050104SW (Upper Owyhee)

Camas Creek should be listed for Temperature
TMDL for temperature EPA approved 3/12/2003 appears on page 14 in Section 4a of IR.

Dry Creek should be listed for unknown pollutant
Dry Creek did not appear on the 1998 303(d) list. DEQ has not monitored Dry Creek; it appears in Section 3 (pages 51 & 52) of the IR.

Nickel Creek should be listed for metals
Nickel Creek has never been listed for Metals. See Chapter 2.1 page 29 of 1998 303(d) list. In 1998 the WQLSeg #6618 was listed for Sediment. EPA approved Sediment TMDL on 3/12/2003. See page 14 in Section 4a of 2002 IR.

Pole Creek should be removed for sediment
Concur

Subbasin 17040207SW (Blackfoot)

Blackfoot River all three segments should be listed for temperature
Angus Creek should be listed for temperature
Spring Creek should be listed for temperature
Diamond Creek should be listed for temperature

The only AUs in the in the Blackfoot (17040207) listed in 1998 for temperature were ID17040207SK026_02 and ID17040207SK026_03.

NEW comment: ID17040207SK026_02 and ID17040207SK026_03 need to have temperature added as a pollutant. While they remain in Section 5 they are listed for Unknown, Siltation, and Bacteria.

Subbasin 17040215SK (Medicine Lodge)

Edie Creek, Fritz Creek, Irving Creek Warm Springs Creek are all be de-listed for nutrients based on a TMDL for sediment. There is no just cause provided for why they

should be de-listed. Even though during public comment period it is recommended that the AU be de-listed for nutrients and IDEQ agrees there still must be the comment made, what rational for it that provides the just cause for the de-listing.

DEQ found no criteria exceedences of either ortho-p or dissolved oxygen as a surrogate for nutrient impairment. DEQ recorded no nuisance or excessive blooms or growths. BLM data supports these findings. Data on file in DEQ-Idaho Falls and e-mail to Lisa Jacobsen as part of record.

You may want to look at these, but they don't require change for EPA analysis

17060209SL029_02a - Allison Creek headwaters to roadless boundary,

17060209SL003_03 - Cottonwood Creek - unnamed trib to mouth,

17060209SL013_02 - Cow Creek - source to mouth,

17060209SL010_03 - Deer Creek - EF Deer Creek to mouth

17060209SL051_02 - Jungle Creek - source to mouth

17060209SL037_04 - Little Slate Creek - Van Buren creek to mouth

17060209SL049_02 - Little Whitebird Creek - source to mouth

First, "Due to time constraints to lab, bacteria sample not collected." but next sentence "Bacteria screening process indicated collection not required for reach" What was the screening process if bacteria was not collected? If it was listed for bacteria in 1998 it would take samples collected and analyzed to take the body of water off of the list. None of these had been listed for bacteria in 1998. Described what screening process was used (needed for future reference/years from now when addressing this issue again.

The bacteria screening process is clearly defined in WBAG2 and has been presented and discussed with Region X. Watershed level analysis of landownership and grazing rights are used to determine the likelihood for a contaminant source. A grab sample is taken and compared to the standard when there is active grazing in the watershed. See WBAG2 pages 7-3 to 7-4.

Coeur d'Alene Lake (ID17010303PN001_02) is not the lake proper. This AU is some 2nd order tributaries that drain straight into the lake. This is an error with NHD that could lead to some serious perception issues. We have re-named the AU as CDA Lake Tribs.